

**EXHIBIT “A”**

<b>Deadline<sup>1</sup></b>	<b>Date</b>
Parties to Exchange Initial Disclosures	4/8/16
Plaintiffs to File Preliminary Witness List	9/15/16
Defendants to File Preliminary Witness List	10/15/16
Telephone Status Conference	9/20/16
Plaintiffs to Serve Statement of Special Damages	9/30/16
Deadline for Plaintiffs to File Motion for Class Certification	10/3/16
Settlement Conference	10/19/16
Defendants to Serve Response to Statement of Special Damages	10/31/16
Deadline for Defendants to File Response to Plaintiffs’ Motion for Class Certification	11/3/16  (or within 30 days of the filing of Plaintiffs’ motion, whichever is earlier)
Deadline for Plaintiffs to File their Reply Brief in Support of Motion for Class Certification	11/21/16  (or within 15 days of the filing of Defendants’ response, whichever is earlier)
Deadline to Serve All Non-Expert Discovery	11/30/16
All Non-Expert Discovery Must Be Complete	12/20/16
Plaintiffs to Identify Expert Witnesses and Serve Expert Witness Reports	1/10/17
Party with the burden of proof shall file a statement of the claims or defenses it intends to prove at trial, stating specifically the legal theories upon which the claims or defenses are based.	1/13/17

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<sup>1</sup> All discovery deadlines included in Exhibit “A” are listed by the parties subject to Defendants’ objection to discovery pending resolution of its motion to dismiss.

**EXHIBIT “A”**

Deadline to File Dispositive Motions	1/16/17
Defendants to Identify Expert Witnesses and Serve Expert Witness Reports	2/10/17
Dispositive Motions Must Be Fully Briefed	3/1/17
All Expert Discovery Must Be Complete	3/1/17
All Motions to Exclude Expert Testimony at Trial Must Be Filed	3/8/17
Parties to File Final Witness & Exhibit Lists	3/15/17
Deadline to File Final Witness Lists, Provide Court With Final List of Sequentially Numbered Exhibits, Submit All Fact Stipulations to the Court, File Summaries of Facts in Depositions to be Offered or Deposition Designations, File Any Trial Briefs and Motions in Limine, Proposed Jury Instructions, Voir Dire Questions, and Proposed Findings of Fact and Conclusions of Law, and Notify Court and Opposing Counsel of Anticipated Use of Any Evidence Presentation Equipment	4/5/17
Deadline to File Motions to Exclude Proposed Exhibits, Submit Deposition Objections and Countersummaries or Designations, File Objections to Any Motions in Limine, Proposed Instructions, and Voir Dire Questions Submitted by Opposing Parties, and Notify the Court and Opposing Counsel of Requests for Separation of Witnesses at Trial	4/12/17
Pre-Trial Conference	4/19/17
Trial	5/8/17 – 5/19/17